

From: "Alan Rowe" <arowe@fcbflorida.com> on 04/05/2004 03:51:06 PM
Subject: Regulation BB - Community Reinvestment Act

4/5/04---Dear Sir or Madam:

This is to write and ask for your full support FOR increasing the small bank CRA to at least \$500 million. It has been my pleasure to serve now as CEO of three community banks in the Orlando, FL area, all of whom earned 'Outstanding' CRA ratings. The prior 2 banks were sold and my current bank also enjoys this rating.

We work very hard to serve all aspects of our community, and I personally know that with the small bank CRA currently in effect, we have done the same things here and worked just as hard, if not harder, as with my prior 2 banks when the 'small bank' standards were not yet an option. Increasing the threshold will free up time and resources better spent meeting the credit needs of all areas of our community, as opposed to filling out superfluous paperwork for voluminous files under the 'big bank' system of CRA.

My over 25 years in banking also allows me to testify that yes, a community bank remains a community bank at \$500 million and beyond, just as much so as at \$250 million. We have the same strategies, issues, and strong commitment to our local communities probably up to the \$1 billion asset size range.

Please do not "buy the lie" from any special interest groups that raising the asset size will in any way jeopardize banks' commitments to serving their local communities. This is a red herring argument from people who obviously have no credible background in community banking. I know from many years of experience, and from numerous similar bankers around the State of Florida, that community banks remain true community banks up to and beyond the \$500 million asset size range. Having to submit to the 'big bank' CRA will only cause high inefficiency, and probably reduce the resources we can commit to actual lending and credit needs--which is the whole point of CRA. Small bank CRA emphasizes results over processes, which is appropriate.

On behalf of our 400 stockholders and over 6,000 account holders, we respectfully request that you strongly SUPPORT increasing the big bank CRA threshold to \$500 million.

Alan Rowe, President & CEO
First Commercial Bank of Florida